

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
)	Case No. 14 Civ. 8925 (KMW)
IN RE SALIX PHARMACEUTICALS, LTD.)	CLASS ACTION
)	
_____)	

**NOTICE OF LEAD PLAINTIFF’S UNOPPOSED MOTION FOR (I) PRELIMINARY
APPROVAL OF SETTLEMENT, (II) CERTIFICATION OF THE SETTLEMENT
CLASS, AND (III) APPROVAL OF NOTICE TO THE SETTLEMENT CLASS**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement dated March 24, 2017 (the “Stipulation”), attached hereto as Exhibit 1; the accompanying memorandum of law; and all other papers and proceedings herein, Lead Plaintiff PWCM Master Fund Ltd., Pentwater Equity Opportunities Master Fund Ltd., Oceana Master Fund Ltd., Pentwater Merger Arbitrage Master Fund Ltd., and LMA SPC for and on behalf of the MAP98 Segregated Portfolio (collectively, “Lead Plaintiff”) hereby moves this Court, under Rule 23 of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed Settlement; (ii) certifying the proposed Settlement Class, certifying Lead Plaintiff and the City of Fort Lauderdale General Employees’ Retirement System as class representatives, and appointing Lead Counsel as class counsel for purposes of the Settlement; (iii) approving the form and manner of giving notice of the proposed Settlement to Settlement Class Members; and (iv) scheduling a hearing to consider final approval of the Settlement and approval of the Plan of Allocation and Lead Counsel’s motion for an award of attorneys’ fees and reimbursement of Litigation Expenses.¹ Attached hereto as Exhibit 2 is the Parties’ agreed-upon proposed Order

¹ All capitalized terms used herein that are not otherwise defined herein have the meanings ascribed to them in the Stipulation.

Preliminarily Approving Settlement and Providing for Notice and its exhibits. Pursuant to the terms of the Stipulation, this motion is unopposed by Defendants.

Dated: March 24, 2017
New York, NY

Respectfully submitted,

BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP

/s/ Salvatore J. Graziano

Salvatore J. Graziano
John Rizio-Hamilton
Katherine M. Sinderson
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
sgraziano@blbglaw.com
johnr@blbglaw.com
katherinem@blbglaw.com

*Counsel for Lead Plaintiff and
Lead Counsel for the Settlement Class*

ROBBINS GELLER RUDMAN & DOWD LLP
Samuel H. Rudman
David Rosenfeld
Mark S. Reich
58 South Service Road, Suite 200
Melville, New York 11747
Telephone: (631) 367-7100
Facsimile: (631) 367-1173
srudman@rgrdlaw.com
drosenfeld@rgrdlaw.com
mreich@rgrdlaw.com

*Additional Counsel for the City of Fort
Lauderdale General Employees' Retirement
System*

#1065512